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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DANIEL LUCERO,

Plaintiff,

v.

ISABEL GUZMAN, Administrator,
Small Business Administration,

Defendant.

Case No. 2:21-cv-00915-RFB-VCF

**Stipulation and Order for Extension
of Time**

(First Request)

Defendant Isabel Guzman, Administrator, Small Business Administration, ("Defendant") and Plaintiff Daniel Lucero ("Plaintiff") hereby stipulate and agree that Defendant may have a seven-day extension of time, from November 2, 2021 to November 9, 2021, to reply to Plaintiff's Response to Agency's Motion to Dismiss (ECF No. 22). This stipulation is brought pursuant to Federal Rule of Civil Procedure 6(b)(1)(A).

Defense counsel's calendar is busier than normal with upcoming hearings and multiple filing deadlines in several cases, including one before the Ninth Circuit. Moreover, due to the coronavirus pandemic, defense counsel and her staff are in the office on a limited basis, thereby slowing the time it takes to prepare and file papers with the Court. Under the

1 circumstances, good cause exists to extend the deadline for Defendant to file her reply. *See*
 2 Fed. R. Civ. P. 6(b)(1)(A) (“When an act may or must be done within a specified time, the
 3 court may, *for good cause*, extend the time...with or without motion or notice if the court acts,
 4 or if a request is made, before the original time or its extension expires[.]”) (emphasis added).

5 This is Defendant’s first request for an extension of time. *See* LR IA 6-1(a) (must
 6 advise of previous extensions). Defense counsel contacted Plaintiff’s counsel regarding this
 7 extension request, and he has advised that he does not oppose the request. This stipulation
 8 is made in good faith and not for the purpose of undue delay.

9 Dated: November 2, 2021.

10 BLACK & WADHAMS

CHRISTOPHER CHIOU
 Acting United States Attorney

11
 12 /s/ Rusty Graf
 RUSTY GRAF
 13 Attorney for Plaintiff

/s/ Holly A. Vance
 HOLLY A. VANCE
 Assistant United States Attorney

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 15 **DATED:** _____

IT IS SO ORDERED:

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 19 **RICHARD E. BOULWARE, II**
United States District Court

20 DATED this 4th day of November, 2021.